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April 1, 1994

Mr. William F. Caton
Office of the Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Subject: Docket 94-18

Dear Mr. Caton,

ITS, Inc., endorses the Commission's consideration to establish a *Federal Advisory Committee to assist the Common Carrier Bureau in the development and implementation of an electronic filing system*. ITS believes that the scope has been well defined in the March 7, 1994 Public Notice 94-44 and, properly executed, would result in improved document management for all parties concerned.

The ITS endorsement is accompanied by volunteering eighteen (18) years of significant experience in FCC document management. As the FCC Duplicating Services Contractor, ITS is in a pivotal position to recognize the need, as well as the potential pitfalls, of an *electronic filing system*. In just the past ten years, ITS has received, retrieved, identified, reproduced, stored, logged, listed, shipped and totally accounted for the processing of a quarter of a billion FCC documents! This valuable experience has not been limited to the primary responsibility of paper document processing but has included all of the elements of an *electronic filing system*, i.e., on-line database systems; computer compatible media transmission, reproduction and storage (magnetic disks/cartridges/tapes and optical disks); Document Management Systems interface; Document Imaging Systems interface and more recently Workflow Management Systems.

In addition to the document processing experience, ITS brings to the table all of the necessary and valuable commercial elements fundamental to the success of the proposed concept. ITS has constantly weighed and analyzed the economic viability of document processing options because it is integral to the success of the ITS/FCC mission, efficient and timely distribution of documents to the FCC public. The pioneering effort by the FCC in the early seventies, the original creation of the present Duplicating Services Contract, and perpetual refinement have resulted in a four way **WIN**:

- The party-of-need **WINS**; they obtain their requested document/s in a timely and efficient manner.
- The taxpayer **WINS**; the party-of-need pays, not all taxpayers.
- The FCC **WINS**; they are relieved of the costly, frustrating and disruptive requirement of document/s retrieval and duplication.
- The contractor **WINS**; they provide a commercially viable and profitable service.

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Actually, there is a fifth **WIN**; the party-of-need is insulated from the FCC and the party-of-need is insulated from their commercial adversaries in the highly volatile, sensitive and economically competitive communications industry. The FCC Common Carrier Bureau/Federal Advisory Committee would achieve maximum successful results in the conceptionalization, design and implementation of an *electronic filing system* by integrating/replicating the valuable Duplicating Contract experience.

ITS requests serious consideration as a member of the proposed Federal Advisory Committee. In addition to the valuable ITS/FCC experience, the principal of ITS, Martin Clark, was a member of the management team of the pioneering commercial database effort, The Source Telecomputing Corporation, (The Source was integrated into CompuServe). The Source was a commercial online database effort that employed the very earliest of *electronic filing systems*. Data was electronically filed by the Information Providers and the subscribers who revolutionized the industry by registering online, using the software and instructions incorporated in new modem boxes, new PC boxes, new printer boxes and new software purchases. These innovative efforts were conceived and implemented by Martin Clark, and they are now acceptable and commonplace practice that is germane to the FCC proposal.

It is clear that FCC Common Carrier Bureau data is ripe for automation, and this begins with *electronic filing systems*. The opportunity is not new and the solution is not new, but the realistic and economic ability to address the issue has only recently become viable. Document Management Systems, Workflow Management Systems and Document Imaging Systems have exploded as a result of the emergence of standards, de facto or specified, and open systems. These accepted standards and improved systems have only become a reality because of the parallel improvements in computer technology. It has only been in recent years, maybe even recent months, that these forces have all emerged to set the stage for an *FCC Federal Advisory Committee to assist the Common Carrier Bureau in the development and implementation of an electronic filing system*. Just this past week, the Federal Office Systems Expo (FOSE) trade show, at the Washington, DC Convention Center, punctuated the reality of the coming of age of the twenty plus year overworked/hackneyed phrase, **the paperless office**. The process begins with *electronic filing systems*.

This new foundation of capabilities has been turbo-charged by discussions of Information SuperHighways, Mobile Computing (Cellular Digital Packet Data-CDPD), Wireless Communications and a whole host of innovative and aggressive communications endeavors. The FCC, the FCC public (communications companies, law firms, engineering firms, media and associations), communications agencies and the commercial vendors fulfilling the document management and document retrieval needs, will all be better served by the prudent development of an economical and efficient *electronic filing system*.

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This *electronic filing system* development will receive universal support and maximum efficiency will be achieved if the initial analysis and recommendation is the result of a comprehensive (broad-based) Federal Advisory Committee. ITS has volunteered to participate and would suggest, and recommend, that the Commission seriously consider participation by not only the obvious mega-communications companies, e.g., AT&T, the mega-communications law firms, e.g., Wiley Rein & Fielding but also the smaller communications organizations, the emerging entities that are unhampered by a heavy burdened past but innovative in their design of productive and user efficient systems, e.g., the aggressive and dynamic systems house of SRA (Systems Research & Applications - Harold G. Boylan 703-558-4700) who have developed comprehensive document management systems for both the Federal Government and the private sector, with emphasis in the telecommunications and legal areas.

In 1985, The Office of Management and Budget published the excellent circular A-130, *Management of Federal Information Resources*. Among the most profound statements, was the following:

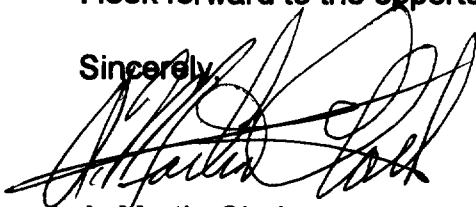
The free flow of information from the government to its citizens and vice versa is essential to a democratic society. It is also essential that the government minimize the Federal paperwork burden on the public, minimize the cost of its information activities, and maximize the usefulness of government information.

Although certain functions are inherently governmental in nature, being so intimately related to the public interest as to mandate performance by Federal employees, the government should look first to private sources, where available, to provide the commercial goods and services needed by the government to act on the public's behalf, particularly when cost comparisons indicate that private performance will be the most economical.

The Commission has the opportunity to continue to excel in their service to the public. The Common Carrier Bureau is at the very core of this opportunity and a judicious development of an electronic filing system would be the booster rocket to launch the Commission into a new orbit of document/information management.....and all parties WIN!

I look forward to the opportunity to contribute and serve.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Martin Clark', written over a series of horizontal lines.

A. Martin Clark
President